

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
DELTA DIVISION**

NATHAN ANDREW BAGLEY

PLAINTIFF

v.

CASE NO. 2:19-cv-00164-JM

HELENA-WEST HELENA SCHOOL DISTRICT, et al.

DEFENDANTS

MOTION FOR SUMMARY JUDGMENT

Defendants, Helena-West Helena School District (“District”), Loistyne Burrell, Sanetta Davis, Lynn Boone, Earnest Simpson, Jr., Daniel Strickland, Janice Williams and Troy Bobo, by their attorneys, for their Motion for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, allege and state:

1. There is insufficient evidence to support any of Plaintiff’s claims in this case.
2. There are no genuine issues of material fact in this matter. Under controlling law, Defendants are entitled to summary judgment.
3. In support of this Motion, Defendants rely upon the accompanying Memorandum Brief in Support of their Motion for Summary Judgment, Statement of Undisputed Material Facts, and upon the entire record in this action.
4. The following exhibits are attached hereto and incorporated herein by reference:
 - Exhibit 1 – Affidavit of Linda English
 - Exhibit 2 – Deposition Transcript of Nathan Bagley
 - Exhibit 3 – Deposition Transcript of Earnest Simpson
 - Exhibit 4 – Deposition Transcript of Sanetta Davis
 - Exhibit 5 – Resume of Nathan Bagley
 - Exhibit 6 – Arkansas Licensure – Nathan Bagley
 - Exhibit 7 – Resume of Linda English

Exhibit 8 – Arkansas Licensure – Linda English

Exhibit 9 – Helena-West Helena School District Board Policy 1.7

WHEREFORE, Defendants, Helena-West Helena School District, Loistyne Burrell, Sanetta Davis, Lynn Boone, Earnest Simpson, Jr., Daniel Strickland, Janice Williams and Troy Bobo, pray that their Motion for Summary Judgment be granted; for Defendants’ attorneys’ fees and costs incurred herein; and for all other appropriate relief to which Defendants may be entitled.

Respectfully submitted,

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